

Robert S. Westermann (VSB No. 43294)
Brittany B. Falabella (VSB No. 80131)
Kollin G. Bender (VSB No. 98912)
HIRSCHLER FLEISCHER, P.C.
The Edgeworth Building
2100 East Cary Street
Post Office Box 500
Richmond, Virginia 23218-0500
Telephone: 804.771.9500
Facsimile: 804.644.0957
E-mail: rwestermann@hirschlerlaw.com
bfalabella@hirschlerlaw.com
kbender@hirschlerlaw.com

David I. Swan (VSB No. 75632)
Allison P. Klena (VSB No. 96400)
HIRSCHLER FLEISCHER, P.C.
1676 International Drive, Suite 1350
Tysons, Virginia 22102
Telephone: 703.584.8900
Facsimile: 703.584.8901
E-mail: dswan@hirschlerlaw.com
aklena@hirschlerlaw.com

*Counsel for Richard Arrowsmith, Liquidating Trustee of
the HDL Liquidating Trust*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

)	Chapter 11
In re:)	
)	Case No. 15-32919-KRH
HEALTH DIAGNOSTIC LABORATORY,)	
INC., et al.,)	Jointly Administered
)	
Debtors.¹)	
)	

NOTICE OF MOTION AND NOTICE OF HEARING

PLEASE TAKE NOTICE that on October 8, 2024, Richard Arrowsmith, in his capacity as the Liquidating Trustee of the HDL Liquidating Trust (the “Liquidating Trustee”), appointed pursuant to the Debtors’ confirmed Modified Second Amended Plan of Liquidation (the “Plan”) in these jointly administered bankruptcy cases (the “Bankruptcy Cases”), by his undersigned counsel, filed with the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division (the “Bankruptcy Court”) a *Motion to Extend the Term of the HDL Liquidating Trust* (the “Motion”) ² in which the Liquidating Trustee request a one year extension of the term of the Liquidating Trust from May 13, 2025 to and including May 13, 2026.

PLEASE TAKE FURTHER NOTICE that a copy of the Motion may be obtained at no charge at www.americanlegal.com/HDL or for a fee at <https://ecf.vaeb.uscourts.gov>.

¹ The Debtors in these Bankruptcy Cases, along with the last four digits of each Debtor’s federal tax identification number, are: Health Diagnostic Laboratory, Inc. (0119), Central Medical Laboratory, LLC (2728), and Integrated Health Leaders, LLC (2434) (the “Debtors”).

² Unless otherwise defined herein, capitalized terms shall have the meanings ascribed to them in the Motion.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motion carefully and discuss it with your attorney if you have one in these Bankruptcy Cases. (If you do not have an attorney, you may wish to consult one.)

PLEASE TAKE FURTHER NOTICE on June 29, 2016, the Bankruptcy Court entered the *Order Establishing Certain Post-Confirmation Notice, Case Management and Administrative Procedures* [Docket No. 1261] (the “Post-Confirmation Case Management Order”), which approved the Notice, Case Management and Administrative Procedures attached as Exhibit 1 to the Post-Confirmation Case Management Order (the “Post-Confirmation Case Management Procedures”). On May 26, 2016, the Bankruptcy Court entered the *Order Establishing Procedures for the Prosecution and Resolution of Avoidance Claims* [Docket No. 1135] (the “Avoidance Procedures Order”). On May 26, 2017, the Bankruptcy Court entered the *Order Approving Amended Procedures Governing Avoidance Action Adversary Proceedings* [Docket No. 2740] (the “Amended Avoidance Procedures Order,” and together with the Avoidance Procedures Order and Post-Confirmation Case Management Order, the “Procedures Orders”). The Procedures Orders, among other things, proscribe the manner in which objections must be filed and served and set forth when certain hearings will be conducted. Copies of the Procedures Orders may be obtained at no charge at www.americanlegal.com/HDL or for a fee at <https://ecf.vaeb.uscourts.gov>.

PLEASE TAKE FURTHER NOTICE THAT if you do not want the Bankruptcy Court to grant the relief sought in the Motion, or if you want the Bankruptcy Court to consider your views on the Motion, then on or before **October 22, 2024** (the “**Response Deadline**”), you or your attorney must:

1. File with the Bankruptcy Court, either electronically or at the address shown below, a written response pursuant to Rule 9013-1 of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Procedures Orders. If you mail your response to the Bankruptcy Court for filing, you must mail it early enough so the Court will **receive** it on or before the Response Deadline.

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street
Richmond, Virginia 23219

2. In accordance with the Procedures Orders, you must also serve a copy of your written response on the Core Parties, the 2002 List Parties, and any Affected Entity so that the response is received on or before the Response Deadline.
3. Attend an in person hearing on the Motion (the “Hearing”) on **October 29, 2024 at 11:00 A.M. (prevailing Eastern Time)** before the Honorable Kevin R. Huennekens, United States Bankruptcy Judge, 701 East Broad Street, Courtroom 5000, Richmond, Virginia 23219.

For the avoidance of doubt, electronic service in accordance with Rule 5005-2 of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia and the Bankruptcy Court's Electronic Case Filing Policy will be deemed valid and effective service under the Procedures Orders.

PLEASE TAKE FURTHER NOTICE THAT you should consult the Procedures Orders before filing any written response.

If you or your attorney do not take these steps, the Bankruptcy Court may deem any opposition waived, treat the Motion as conceded, and enter appropriate orders granting the requested relief without further notice or hearing.

DATED: October 8, 2024

/s/ Robert S. Westermann

Robert S. Westermann (VSB No. 43294)
Brittany B. Falabella (VSB No. 80131)
Kollin G. Bender (VSB No. 98912)
HIRSCHLER FLEISCHER, P.C.
The Edgeworth Building
2100 East Cary Street
Richmond, Virginia 23218-0500
Telephone: 804.771.9500
Facsimile: 804.644.0957
E-mail: rwestermann@hirschlerlaw.com
bfalabella@hirschlerlaw.com
kbender@hirschlerlaw.com

David I. Swan (VSB No. 75632)
Allison P. Klena (VSB No. 96400)
HIRSCHLER FLEISCHER, PC
1676 International Drive, Suite 1350
Tysons, Virginia 22102
Telephone: 703.584.8900
Facsimile: 703.584.8901
E-mail: dswan@hirschlerlaw.com
aklena@hirschlerlaw.com

*Counsel for Richard Arrowsmith, Liquidating
Trustee of the HDL Liquidating Trust*